

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448-YGR

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION REGARDING CERTAIN
ASPECTS OF THE STATE AGS' COPPA
CLAIM**

The State Attorneys General ("State AGs") and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, "Meta," and together, the "Parties") respectfully submit this Stipulation:

WHEREAS the Court directed the Parties to file any agreed-upon stipulation by January 9, 2026, to the extent they are able to narrow issues in relation to the Parties' anticipated summary judgment and Rule 702 motions.

WHEREAS the Parties have been able to reach an agreement to narrow certain aspects of the State AGs' anticipated summary judgment motion regarding their claim under the Children's Online

1 Privacy Protection Act, 15 U.S.C. § 6501, *et. seq.*, and the Children’s Online Privacy Protection Rule,
2 16 C.F.R. § 312.1, *et. seq.*, (collectively, “COPPA”).

3 The Parties, through their undersigned counsel, hereby stipulate as follows for the purposes of
4 the State AGs’ action, *People of the State of California, et al. v. Meta Platforms, Inc., et al.* (the
5 “Action”), and the State AGs’ claim under COPPA only:

- 6 1. Instagram and Facebook are “websites” and “online services” as those terms are used
7 in COPPA.
- 8 2. At all times relevant to the Action, Meta Platforms, Inc. has been the “operator,” as that
9 term is used in COPPA, of Facebook.

10
11 **IT IS SO STIPULATED AND AGREED.**

12 Respectfully submitted,

13 DATED: January 9, 2026

By: /s/ Joshua Olszewski-Jubelirer

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SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Joshua Olszewski-Jubelirer, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: January 9, 2026

/s/ Joshua Olszewski-Jubelirer